

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

Case No. 24-CR-50-JDP

STEVEN ANDEREGG,

DEFENDANT.

**GOVERNMENT’S RESPONSE IN OPPOSITION TO DEFENDANT’S MOTION TO
MODIFY CONDITIONS OF RELEASE**

The United States of America, by and through undersigned counsel, submits this response in opposition to the defendant’s motion to modify the conditions of his supervised release. [ECF No. 44].

On August 29, 2024, undersigned counsel advised defense counsel and the U.S. Probation Office that the government would defer to the U.S. Probation Office as to a request from the defendant that he be permitted to have a single phone call with a minor. Undersigned counsel also requested that, to the extent the defendant be permitted to have that phone call, it be monitored by an appropriate third party. It appears that the scope of the government’s position was inadvertently unclear, however, so undersigned counsel is filing this response. The government opposes the defendant’s instant motion, to the extent he is requesting to have unlimited and unsupervised telephonic contact with a minor. For the reasons articulated in the government’s brief in support of detention [ECF No. 6] and, in particular, the government’s sealed supplemental brief in support of

detention [ECF No. 20], as well as the argument raised at the defendant's previous detention hearings, the government does not believe it is appropriate for the defendant to have ongoing and unsupervised contact with a minor.

If the Court desires a hearing on the defendant's motion, undersigned counsel joins in the defendant's request to have that hearing take place remotely.

Dated this 27th day of September, 2024.

Respectfully submitted,

STEVEN J. GROCKI
Chief, Child Exploitation & Obscenity Section

By:

/s/ William G. Clayman
William G. Clayman
Trial Attorney